



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**FEB 18 2016**

REPLY TO THE ATTENTION OF:  
WU-16J

**CERTIFIED MAIL 7014 2870 0001 9579 9649**  
**RETURN RECEIPT REQUESTED**

Mr. Kenneth R. Langerak  
Great Lakes Petroleum Producers, Inc.  
Post Office Box 713  
Jenison, Michigan 49429

**Subject: Information Request No. V-UIC-16-1445-001 Pursuant to Section 1445(a) of the Safe Drinking Water Act, 42 U.S.C. § 300j-4, 40 C.F.R. §§ 144.17 and 144.51(h), and U.S. Environmental Protection Agency Permit #MI-081-2D-0007**

Dear Mr. Langerak:

EPA is gathering information related to the operation of the Riverside #2 well (EPA #MI-081-2D-0007) issued to Great Lakes Petroleum Producers, Inc. This request requires information regarding historic operations and maintenance of the Riverside #2 well located in Kent County, Michigan. EPA is authorized under Section 1445(a) of the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300j-4, and 40 C.F.R. §§ 144.17 and 144.51(h), to require reports and other information necessary to evaluate compliance with SDWA or its implementing regulations. In addition, Part I (E)(6) of your permit establishes the duty to provide information to determine compliance with the permit, as required under 40 C.F.R. § 144.51(h). Accordingly, you are directed under these authorities to provide EPA with the information requested in the enclosure.

Please submit the information requested with a statement certifying that all representations contained therein are true and accurate to the best of your knowledge and belief using the exact certification language provided in the Information Request. Please exercise care to assure that responses are complete and accurate. Failure to fully and truthfully respond to requests for information issued under Section 1445(a) of SDWA, 42 U.S.C. § 300j-4(a), can result in significant civil, criminal, or administrative penalties under Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c). Please be advised that provisions of false, fictitious, or fraudulent statements or representations may subject you to criminal fines or up to five years of imprisonment or both under 18 U.S.C. § 1001.

EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act, 44 U.S.C. §§ 3501 – 3521.


Neither the issuance of this Information Request by EPA nor compliance with this Information Request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c), including but not limited to any violations addressed by this Information Request. EPA specifically reserves the right to seek any or all of the remedies specified in Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b)(1), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c).

Please respond in writing with the information requested in the enclosure, within forty-five (45) days of receipt of this letter with copies to:

Underground Injection Control Branch  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Blvd. (WU-16J)  
Chicago, Illinois 60604-3590  
Attention: Tim Elkins, Enforcement Officer

Thank you for your cooperation in this matter. Should you have any questions, please contact Tim Elkins of my staff at (312) 886-0263 or at [elkins.timothy@epa.gov](mailto:elkins.timothy@epa.gov).

Sincerely,



Tinka G. Hyde  
Director, Water Division

Enclosure

cc w/enclosures (via email):

Joe Pettit, MDEQ  
Larry Organek, MDEQ

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>IN THE MATTER OF:</b>	)	Request No. V-UIC-16-1445-001
	)	
Great Lakes Petroleum Producers, Inc.	)	Proceeding under
of Jenison, Michigan	)	Section 1445(a) of the
	)	Safe Drinking Water Act,
UIC Permit No. MI-081-2D-0007	)	42 U.S.C. § 300j-4, and
"Riverside #2" well	)	40 C.F.R. §§ 144.17 and
	)	144.51(h)

**INFORMATION REQUEST**

**I. STATUTORY AUTHORITY**

The following request is made to Great Lakes Petroleum Producers, Inc. ("Great Lakes Petroleum Producers" or "You") pursuant to the authority vested in the Administrator of the U.S. Environmental Protection Agency by the Safe Drinking Water Act (SDWA), 42 U.S.C. §§ 300f - 300j-26, 40 C.F.R. § 144.17, and Part I (E)(6) of the Underground Injection Control (UIC) Permit #MI-081-2D-0007, which establishes the duty to provide information required under 40 C.F.R. § 144.51(h). The EPA Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has duly re-delegated this authority to the undersigned Director of the Water Division, Region 5. Failing to adequately respond to requests for information issued under Section 1445(a) of SDWA, 42 U.S.C. § 300j-4(a), can result in significant civil, criminal, or administrative penalties under Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c).

**II. INSTRUCTIONS**

1. You must respond separately to each of the questions or requests in the Information Request. Where a "yes" or "no" answer is requested, you may provide additional information. Precede each answer with the number of the Information Request to which it corresponds. For each record produced in response to this Information Request, indicate on the record, or in some other reasonable manner, the number of the question or request to which it responds.
2. You must respond to each question based upon all information and records in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of source. You must provide responses to the best of your ability, even if the information sought was never put down in writing or if the written records are no longer available.
3. If information not known or not available to You as of the date of submission of your response should later become known or available, You must supplement your response to

EPA. Moreover, should You find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, You must notify EPA as soon as possible.

4. In answering each question or request, identify all persons and contributing sources of information You relied on for your answer.
5. If any of the requested records have been transferred to others or have otherwise been disposed of, identify each record, the person to whom it was transferred, describe the circumstances surrounding the transfer or disposition, and state the date of the transfer or disposition.
6. If Great Lakes Petroleum Producers, Inc. does not have records responsive to a particular question or request, state in your written response that You do not have such records.
7. Confidential Information. You must provide the information requested even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." Your confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201 - 2.311. Under 40 C.F.R. § 144.5, the entitlement does not apply to information in permit application forms, and claims of confidentiality for the following will be denied: name and address of any permit applicant or permittee, permit applications, permits, and injection data. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice. **If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice to You.**
8. In submitting the information required in this Information Request, Great Lakes Petroleum Producers, Inc. must provide the following certification signed by a person occupying an applicable position listed in 40 C.F.R. § 144.32 or a duly authorized representative of that person:

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

The individual who prepared the response or the authorized representative acting on behalf of Great Lakes Petroleum Producers must sign and date the statement, affidavit, or certification. Include the company official's full title.

9. Great Lakes Petroleum Producers must maintain all reports and records reviewed or generated in the course of responding to this Information Request until EPA informs You that maintenance of such records is no longer required or for three years, whichever is sooner.

### III. DEFINITIONS

1. "Day" or "days" means a calendar day or calendar days. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of the next business day.
2. "EPA" means the United States Environmental Protection Agency.
3. "Facility or activity" means any Well and tank batteries associated with such Well.
4. "Fluid" means any material or substance which flows or moves whether in a semisolid, liquid, sludge, gas, or any other form or state.
5. "Injection" means the subsurface emplacement of fluids through a well.
6. "Injection well" means a "well" into which "fluids" are being injected.
7. "Manifest" means the shipping document originated and signed by the "generator" which contains the information required by Subpart B of 40 C.F.R. Part 262.
8. "Owner or operator" means the owner or operator of any "facility or activity" subject to regulation under the UIC program.
9. "Permit" means the following authorization issued by EPA to operate an injection well and implement the requirements of 40 C.F.R. Parts 144, 145, 146, and 124:  

MI-081-2D-0007 "Riverside #2"
10. "Person" means an individual, association, partnership, corporation, municipality, State, Federal, or Tribal agency, or an agency or employee thereof.
11. "Record" or "records" means, for purposes of this Information Request, any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, emails, computer files, computer printouts, and computer databases.
12. "Regional Administrator" means the Regional Administrator of the appropriate Regional Office of the Environmental Protection Agency or the authorized representative of the Regional Administrator.
13. "SDWA" means the Safe Drinking Water Act (Pub. L. 93-523, as amended; 42 U.S.C. §§ 300f - 300j-26).

14. "Total dissolved solids" means the total dissolved (filterable) solids as determined by use of the method specified in 40 C.F.R. Part 136.
15. "Transferee" means the owner or operator receiving ownership and/or operational control of the well.
16. "Transferor" means the owner or operator transferring ownership and/or operational control of the well.
17. "UIC" means the Underground Injection Control program under Part C of the Safe Drinking Water Act, including an "approved State program."
18. "Underground injection" means a "well injection."
19. "Underground source of drinking water (USDW)" means an aquifer or its portion:
  - (a)(1) Which supplies any public water system; or
  - (2) Which contains a sufficient quantity of ground water to supply a public water system; and
    - (i) Currently supplies drinking water for human consumption; or
    - (ii) Contains fewer than 10,000 mg/l total dissolved solids; and
  - (b) Which is not an exempted aquifer.
20. "Well" means a subsurface fluid distribution system identified in the EPA permits implementing the requirements of 40 C.F.R. Parts 144, 145, 146, and 124.
21. "Well injection" means the subsurface emplacement of fluids through a well.
22. "You" for purposes of this Information Request means Great Lakes Petroleum Producers, Inc., and its officers, managers, trustees, any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the direction of Great Lakes Petroleum Producers, Inc.

#### IV. REQUESTS

1. Identify all persons consulted or contacted in the preparation of the answers to this Information Request, and provide the contact person(s) full title, telephone, fax, and email contact information.
2. Provide the address of all locations where You maintain Records relative to the operation and maintenance of the Riverside #2.
3. Provide the name(s) of the primary contact person(s) responsible for operation and maintenance of the Riverside #2 well since January 1, 2013. Also include the contact person(s) full title, telephone, fax, and email contact information.
4. Provide copies of all Records (including but not limited to daily sheets, notes, raw data, etc.) which You relied on to generate monthly monitoring reports You submitted to EPA

for the Riverside #2 well since January 1, 2013, including but not limited to all Records identifying the date(s), time(s), technique(s) or method(s), result(s), and the name(s) of the individual(s) who performed measurements of injection pressure, annulus pressure, flow rate, and cumulative injected volume.

5. Provide copies of all gage calibration and maintenance records for the Riverside #2 well since January 1, 2013.
6. Provide the following information for sources of all injected fluid(s) for the Riverside #2 since January 1, 2013:
  - a. Name(s), address(es) and phone number(s) of the waste generator(s) or producer(s), including name(s) of the company(ies) that own or operate the production well(s) from which injection fluids originated;
  - b. Name(s) and applicable Federal or State ID number(s) of the waste hauler(s) or transporter(s) which brought the injected fluids to the Riverside #2 or tank batteries;
  - c. Name(s) of the production well(s) from which injection fluids originated;
  - d. Name(s) of field(s) or project(s) from which injection fluids originated; and
  - e. Township Section and Range of each production well from which injected fluids originated (i.e. production well locations).
7. For each fluid injected at the Facility since January 1, 2013 which originated from sources other than production wells owned or operated by Great Lakes Petroleum Producers, Inc., please produce a chart including the information contemplated by the column headings below for each such fluid. If the volume of such fluid was metered, then provide in the chart the volume of fluid injected at the Facility. If that flow is not metered, then provide in the chart estimates of the volume of fluids transported to the Facility and injected into the Riverside #2 from sources not owned or operated by You since January 1, 2013. Describe the basis for all estimates of fluid volume.

Company, Well Name, Well Location and Fluid Type	Number of Barrels/Gallons Injected	Date(s) (mm/dd/yyyy)	Was EPA notified of the addition of this source with a permit modification request? Yes (with date) or No

8. Provide copies of all Records relied on to prepare answers to Request 7, including all field tickets, receipts, invoices, delivery records, brine manifests, or other Records.
9. Has Great Lakes Petroleum Producers injected any fluid or materials into any of the Riverside #2 which are not saltwater or brine from the production of oil and gas wells?  
Yes \_\_\_\_\_ No \_\_\_\_\_



If the answer to this question is yes, then for each such injection identify the source of the injected material, the date of injection, and volume of the fluid or materials injected.

10. Has Great Lakes Petroleum Producers entered into written (e.g., contracts, charters, etc.) or verbal agreements with other companies or oil and gas producers for the disposal of fluid or other materials at the Riverside #2 facility?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe and include dates of transaction and terms of agreements, and provide copies of all written records of those agreements.

11. Has Great Lakes Petroleum Producers, Inc. ever received payment for the disposal of any fluids or other materials into the Riverside #2 well?

Yes \_\_\_\_\_ No \_\_\_\_\_

If the answer to this question is yes, identify the date and dollar amount of any such payment, service, or exchange of goods, the type and amount of the fluids, the name of the source of the fluids and provide copies of all Records which indicate the date and dollar amount of the payments.

12. Provide the name and contact information of any person(s) or companies which own or have owned any stake or partial ownership of the Riverside #2 since January 1, 2013.

13. Has any ownership, in whole or part, of the Riverside #2 well changed since the time permit #MI-081-2D-0007 was issued to Great Lakes Development Company and later transferred to Great Lakes Petroleum Producers, Inc.?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide copies of all documents evidencing all changes in ownership and answer the questions below for each change in ownership.

Was the Michigan Department of Environmental Quality (MDEQ) notified of all changes in ownership?

Yes \_\_\_\_\_ No \_\_\_\_\_

Was the EPA notified of all changes in ownership?

Yes \_\_\_\_\_ No \_\_\_\_\_

Did MDEQ approve of the change(s) in ownership of the Riverside #2 well?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answer yes to any of the above questions, please explain any changes in ownership and provide all records of the notices and approvals.

14. Does Great Lakes Petroleum Producers, Inc. have a procedure for requesting EPA approval of additional injection fluid sources?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please describe your procedure and provide all documents related to the procedure.



15. Describe all routine and unscheduled maintenance or repairs made on the Riverside #2 well since January 1, 2013, along the name of the individual in charge of such maintenance.

Please submit your responses to this Information Request within forty-five (45) calendar days from the receipt of the letter transmitting this Request to:

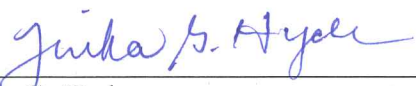
Underground Injection Control Branch (WU-16J)  
U.S. EPA Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3590  
Attention: Timothy Elkins, Enforcement Officer

This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 - 3521, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

EPA may use the information submitted in response to this Information Request in an administrative, civil, or criminal action.

Neither the issuance of this Information Request by EPA nor compliance with this Information Request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c), including but not limited to any violations addressed by this Information Request. EPA specifically reserves the right to seek any or all of the remedies specified in Section 1423(b) of SDWA, 42 U.S.C. § 300h-2(b)(1), and Section 1423(c) of SDWA, 42 U.S.C. § 300h-2(c).

Please contact Tim Elkins of my staff at (312) 886-0263, or via email at [elkins.timothy@epa.gov](mailto:elkins.timothy@epa.gov), if you have any questions about this Information Request.

  
\_\_\_\_\_  
Tinka G. Hyde  
Director, Water Division  
U.S. Environmental Protection Agency  
Region 5

Date 2/18/16